

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

VIVIAN BERT, et al.,	:	Case No. C-1-02-467
	:	
Plaintiffs,	:	Judge Beckwith
	:	
v.	:	JOINT MOTION FOR EXTENSION
	:	OF PRE-TRIAL DATES SET FORTH
AK STEEL CORPORATION,	:	<u>IN THE COURT'S CALENDAR ORDER</u>
	:	
Defendant.	:	

The Parties jointly move for an extension of two of the dates set forth in the Court's Calendar Order of January 6, 2003. The Parties agree that, due to the nature of the case, additional time is required for discovery in this matter. The Parties respectfully request that the cut-off for discovery be extended ninety (90) days until March 1, 2003. Similarly, the Parties request that Plaintiff's deadline to move for class certification be extended ninety (90) days until December 5, 2004. No trial date has yet been set in this matter.

Respectfully submitted,

/s/ Paul H. Tobias
(per telephone authorization 11/5/03)
Paul H. Tobias
David Kammer
Tobias, Kraus & Torchia
911 Mercantile Library Building
414 Walnut Street
Cincinnati, OH 45202

Trial Attorneys for Plaintiffs

/s/ Patricia Anderson Pryor

Lawrence J. Barty (0016002)
Patricia Anderson Pryor (0069545)
Gregory Parker Rogers (0042323)
Roger A. Weber (0001257)
Taft, Stettinius & Hollister LLP
425 Walnut Street, Suite 1800
Cincinnati, Ohio 45202-3957
(513) 381-2838

Trial Attorneys for Defendant
AK Steel Corporation